

**REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed August 28, 2003. Claims 1-45 are pending in the Application. The Examiner rejected Claims 1-45. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

**In the Drawings**

The Examiner objects to FIGURE 2, stating that it fails to comply with 37 C.F.R. § 1.84(p)(5) because it includes reference numeral 3000, which is not mentioned in the description. The specification has been amended, as indicated above, to include reference numeral 3000. Therefore, Applicants respectfully request that this object be withdrawn.

**Section 102 Rejections**

The Examiner rejects Claims 1-45 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,584,562 issued to Fiori ("*Fiori*").

*Fiori* discloses a system for securing a telephone link between two subscribers using encryption keys to encrypt the communication between two subscriber sets capable of engaging in secure communications. (*Fiori*, Col. 6; Lines 29-44). A calling subscriber set may initiate a call indicating that they wish the communication to be secure. (*Fiori*, Col. 6; Lines 29-32). A server then determines if the called subscriber set is capable of engaging in secured communications. (*Fiori*, Col. 6; Lines 34-38). If the called subscriber set is capable of engaging in secure communications, a secure communication link is established and the communications between the subscriber sets are encrypted. An encryption key is sent to a terminal associated with each subscriber set so that the incoming encrypted communications to each subscriber set can be deciphered. (*Fiori*, Col. 7; Lines 1-9). If a telephone link is desired between a subscriber set capable of engaging in secure communications and a subscriber set incapable of engaging in secure communications, the calling subscriber set has the option of engaging in an unsecured communication with the called subscriber set, or

terminating the attempt to create a telephone link to the called subscriber set. (*Fiori*, Col. 6; Lines 38-44, Col. 7; Lines 31-37).

Claim 1, as amended, of the present application recites:

A method for establishing a telephone call between a trusted Internet Protocol (IP) telephone and an untrusted device, the method comprising:

receiving a call initiation request from an untrusted device external to a trusted network, the call initiation request indicating a desired communication with a trusted IP telephone coupled to the trusted network;

evaluating the call initiation request; and

establishing a telecommunication link between the untrusted device and the trusted IP telephone in response to a positive evaluation of the call initiation request, wherein establishing the telecommunication link comprises:

associating a first logical port of a telephony proxy with the trusted IP telephone;

associating a second logical port of the telephony proxy with the untrusted device;

receiving first telecommunication data from the untrusted device at the first logical port;

modifying a first source address information in the first telecommunication data to specify the second logical port of the telephony proxy;

communicating the first telecommunication data with the modified first source address information to the trusted IP telephone;

receiving second telecommunication data from the trusted IP telephone at the second logical port;

modifying a second source address information in the second telecommunication data to specify the first logical port of the telephony proxy; and

communicating the second telecommunication data with the modified second source address information to the untrusted device.

Claims 2 and 26, as amended, recite similar, although not identical, limitations.

**Claims 1, 2, and 26 are Allowable over *Fiori***

Claim 1, as amended, recites receiving a call initiation request from an untrusted device external to a trusted network, the call initiation request indicating a desired communication with a trusted IP telephone coupled to the trusted network. Claims 2 and 26,

as amended, recite similar, although not identical, limitations. *Fiori* fails to disclose a trusted network, let alone an untrusted device external to a trusted network or a trusted IP telephone coupled to the trusted network, as recited in amended Claim 1, and similarly, although not identically in amended Claims 2 and 26. *Fiori* merely discloses an encryption/decryption means for encapsulating a communication between two devices that are both capable of engaging in secure communications irregardless of the status of the network or networks that the devices are connected to.

Furthermore, Claim 1 recites: 1) modifying a first source address information in the first telecommunication data to specify the second logical port of the telephony proxy, and 2) modifying a second source address information in the second telecommunication data to specify the first logical port of the telephony proxy. The Examiner states that *Fiori* discloses these limitations. (Office Action mailed 8/28/03, page 3, citing *Fiori*, Col. 7 and Claims 1 and 15). *Fiori* discloses generating an encryption key for the communications between subscriber sets and encrypting the identifiers of subscriber taps associated with a subscriber set to secure the content of the communications between the subscriber sets. However, *Fiori* fails to disclose modifying a first source address information to specify the second logical port of the telephony proxy or modifying a second source address information in the second telecommunications data to specify the first logical port of the telephony proxy, as recited in amended Claim 1.

For at least these reasons, Claims 1, 2, and 26 are allowable over *Fiori*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 1, 2, and 26, as well as all claims that depend from those claims.

**Claims 14 and 38 are Allowable over *Fiori***

Claim 14 recites, in part, a trusted telephone coupled to the first trusted network and an untrusted device external to the first trusted network. Claim 38 recites similar, although not identical, limitations. As discussed above with respect to Claim 1, *Fiori* fails to disclose a trusted network, let alone a trusted telephone coupled to the trusted network or an untrusted device external to a trusted network.

For at least this reason, Claims 14 and 38 are allowable over *Fiori*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 14 and 38, as well as all claims that depend from those claims.

**Claims 3 and 27 are Allowable over *Fiori***

In addition to their dependence on Claims 2 and 26, which have been shown to be allowable for the reasons discussed above, Claims 3 and 27 are allowable because they contain additional limitations not disclosed in *Fiori*. Claim 3 recites intercepting a call initiation request at an entry point to the trusted network servicing the trusted IP telephone. Claim 27 recites similar, although not identical, limitations. The Examiner states that *Fiori* discloses this limitation. (Office Action mailed 8/28/03, page 5, citing *Fiori*, Figure 1). However, nowhere does *Fiori* disclose intercepting a call initiation request at an entry point to the trusted network, as recited in Claim 3 and similarly, although not identically, in Claim 27.

For at least this additional reason, Claims 3 and 27 are allowable over *Fiori*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 3 and 27.

**Claims 11-13, 35-37, and 43-45 are Allowable over *Fiori***

Claims 11-13, 35-37, and 43-45 depend from Claims 2, 26, and 38, respectively, which have been shown to be allowable for the reasons discussed above. In addition, Claims 11-13, 35-37, and 43-45 are allowable because they recite additional limitations not disclosed in *Fiori*. For example, Claim 11 recites modifying source address information in the received telecommunication data to specify a second logical port of the telephony proxy associated with the untrusted device. Claims 35 and 43 recite similar, although not identical, limitations. As discussed above with reference to Claim 1, *Fiori* fails to disclose this limitation.

For at least this additional reason, Claims 11, 35, and 43 are allowable over *Fiori*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 11, 35, and 43, as well as all Claims 12-13, 36-37, and 44-45 that depend, respectively, from those claims.

**Claims 22-23 and 39-40 are Allowable over *Fiori***

Claims 22-23 and 39-40 depend from Claims 14 and 38, respectively, which have been shown to be allowable for the reasons discussed above. In addition to their dependence upon allowable independent claims, Claims 22-23 and 39-40 are allowable because they recite additional limitations not disclosed in *Fiori*. For example, Claim 22 recites an authentication controller comprising a list of addresses of network devices permitted to receive telephone calls from untrusted devices. Claim 39 recites similar, although not identical, limitations. Furthermore, Claim 23 recites an authentication controller comprising a list of network addresses of untrusted devices permitted to communicate with the trusted telephone. Claim 40 recites similar, although not identical, limitations.

The Examiner states that the additional limitations recited by Claims 22-23 and 39-40 are disclosed in *Fiori*. (Office Action mailed 8/28/03, pages 7-8, citing *Fiori*, Col. 4; Lines 22+, Col. 6; Lines 23-28, and Col. 7; Lines 38-67). However, *Fiori* fails to disclose these additional limitations. *Fiori* discloses a server that contains a central file cataloging the subscribers who have signed up for the securing service. (*Fiori*, Col. 6; Lines 23-28). In other words, *Fiori's* server merely identifies those devices that are capable of engaging in secure communications. In contrast, the present application recites a list of addresses of network devices permitted to receive telephone calls from untrusted devices and a list of network address of devices of untrusted devices permitted to communicate with the trusted telephone.

For at least this additional reason, Claims 22-23 and 39-40 are allowable over *Fiori*. Therefore, Applicants respectfully request reconsideration and allowance of Claims 22-23 and 39-40.

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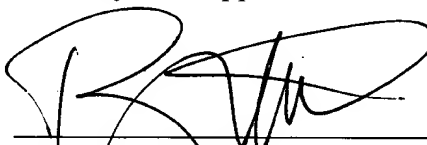
**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brian W. Oaks, Attorney for Applicants, at the Examiner's convenience at (214) 953-6986.

The required fee of \$180.00 is submitted herewith for the IDS and is believed to be correct. The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,  
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